

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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Satyanarayan Hegde, MD,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. _____
	)	
	)	JURY TRIAL DEMANDED
	)	
Montefiore Medical Center,	)	
Albert Einstein College of Medicine,	)	
Raanan Arens, MD	)	
David Gozal, MD	)	
Recruitwell,	)	
Erin Brites,	)	
Alan Lamb,	)	
Chris Noel,	)	
	)	
Defendants.	)	
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**COMPLAINT**

Plaintiff, Satyanarayan Hegde, MD ("Plaintiff"), acting *Pro Se*, for his Complaint against Defendants, alleges as follows:

**PARTIES**

1. Plaintiff is a licensed physician, residing at 658 NW 120th Ter, #6-325, Gainesville, FL 32607.
  
2. Defendant Montefiore Medical Center ("MMC") is a medical center with an address at 111 East 210th Street, Bronx, NY 10467.
  
3. Defendant Albert Einstein College of Medicine is located at 1300 Morris Park Avenue, Bronx, NY 10461.
  
4. Defendant Dr. Raanan Arens is an agent of MMC and/or Albert Einstein College of

Medicine.

5. Defendant Dr. David Gozal is an individual with an address at 1600 Medical Center Drive, Huntington, WV 25701.

6. Defendant Recruitwell is a recruiting agency located at 5588 Broadcast Court, Sarasota, FL 34240.

7. Defendants Erin Brites, Alan Lamb, and Chris Noel are agents and/or employees of Recruitwell.

### **JURISDICTION AND VENUE**

8. This Court has jurisdiction pursuant to 15 U.S.C. § 1681p and 28 U.S.C. § 1331 because this action arises under the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 et seq.

9. Venue is proper in this district pursuant to 28 U.S.C. § 1391 and 15 U.S.C. § 1681p because a substantial part of the events giving rise to the claim occurred in this district and/or the defendants are found, inhabit, or transact business here.

### **FACTUAL ALLEGATIONS**

10. On or around May 15, 2020, and subsequently on multiple occasions, Plaintiff applied for employment as a physician at MMC, a position for which he was qualified.

11. Plaintiff is a well-respected physician with all credentials in good standing at all times.

12. On or around June 16, 2020, and thereafter, MMC refused to hire Plaintiff without giving a reason.

13. In November 2021, Plaintiff initiated a lawsuit against MMC for Title VII discrimination, which was voluntarily dismissed in March 2024.

14. During discovery in that lawsuit, for the first time, Plaintiff became aware that the true reason for his non-hire was an unfavorable background check.

15. During depositions, Dr. Raanan Arens and Dr. David Gozal admitted to

conducting background checks on Plaintiff through email and private phone calls.

16. MMC agent John Pinto admitted he conducted a background check on Plaintiff and relied upon background information provided by Drs. Arens and Gozal.

17. Mr. Pinto also admitted that this background check was conducted on behalf of the Medical Staff Organization of MMC.

18. Upon information and belief, Recruitwell and its employees, Erin Brites, Alan Lamb, and Chris Noel, also conducted background checks on Plaintiff.

19. Upon information and belief, Recruitwell and its agents shared information obtained from background checks with MMC and its agents.

20. Defendants failed to comply with the notice, authorization, and procedural safeguards required by the FCRA before obtaining or using Plaintiff's consumer report for employment purposes.

21. Plaintiff never received a copy of the background check, nor was he provided an opportunity to dispute the information contained therein prior to any adverse employment decision.

#### **CLAIM FOR RELIEF**

(Violation of the Fair Credit Reporting Act - 15 U.S.C. § 1681b, § 1681d, § 1681m)

22. Plaintiff incorporates by reference the foregoing paragraphs.

23. Defendants procured or caused to be procured a consumer report or investigative consumer report on Plaintiff without obtaining proper authorization as required by 15 U.S.C. § 1681b(b)(2)(A).

24. Defendants used the consumer report for employment purposes without providing Plaintiff with a copy of the report and a summary of his rights under the FCRA before taking adverse action against him, in violation of 15 U.S.C. § 1681b(b)(3).

25. Defendants failed to comply with the FCRA's requirements for investigative consumer reports under 15 U.S.C. § 1681d.

26. Defendants failed to provide the required adverse action notice under 15 U.S.C. § 1681m.

27. As a result of Defendants' willful and/or negligent violations of the FCRA, Plaintiff has suffered damages including but not limited to loss of employment opportunities, emotional distress, reputational harm, and other damages.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award actual damages pursuant to 15 U.S.C. § 1681n and/or § 1681o;
- B. Award statutory damages of not less than \$100 and not more than \$1,000 for each violation pursuant to 15 U.S.C. § 1681n(a)(1)(A);
- C. Award punitive damages for willful violations pursuant to 15 U.S.C. § 1681n;
- D. Award costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1681n and/or § 1681o;
- E. Grant such other and further relief as the Court deems just and proper.

Dated: May 14, 2025

Respectfully submitted,

s/Satyanarayan Hegde, MD, Acting *Pro Se*.  
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